

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
International Comparison and Consumer)	GN Docket No. 09-47
Survey Requirements in the Broadband)	
Data Improvement Act)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Inquiry Concerning the Deployment of)	GN Docket No. 09-137
Advanced Telecommunications Capability)	
To All Americans in a Reasonable and)	
Timely Fashion, and Possible Steps to)	
Accelerate Such Deployment Pursuant to)	
Section 706 of the Telecommunications)	
Act of 1996, as Amended by the Broadband)	
Data Improvement Act)	

To: Secretary, Federal Communications Commission
Attention: The Commission

**COMMENTS OF KCTS TELEVISION
IN RESPONSE TO NBP PUBLIC NOTICE # 26**

KCTS Television provides these comments in response to the Commission's Public Notice¹ seeking comment in the referenced dockets on spectrum for broadband.

We are the licensee of noncommercial educational television stations KCTS-DT in Seattle, Washington and KYVE-DT in Yakima, Washington. Our mission is to improve the quality of life in the communities we serve by providing meaningful programming on air, online and in the community that *informs, involves and inspires*. We

¹ *Data Sought on Uses of Spectrum - NBP Public Notice #26*, GN Docket Nos. 09-47, 09-51, 09-137, Public Notice, DA 09-2518 (rel. December 2, 2009) (the "Public Notice").

are at core a local community institution. KCTS Television was supported in our last fiscal year by over 109,000 individual donors. 71% of station revenue comes directly from community support, including individual, corporate and foundation support.

KCTS and KYVE serve 2.4 million viewers weekly, with a potential universe of over 7.5 million viewers. We provide three, 24/7 digital channels in Western and Central Washington: KCTS 9 HD, KCTS 9 V-me and KCTS 9 Create. We know from Nielsen that nine percent (9%) of our viewers in the Seattle area and fifteen percent (15%) of our viewers in the Yakima area receive television via over-the air-signals. This not insignificant percentage of viewers of KCTS and KYVE would have to buy service if our over-the-air signal were unavailable. Due to age, income level, location and affordability of alternative distribution mechanism, a large part of our viewing audience who view us over-the-air would not likely subscribe to an alternative distribution mechanism if the over-the-air service is curtailed or eliminated.

In the Public Notice, with a mind toward finding additional spectrum to allocate for wireless broadband purposes, the Commission seeks specific data on the use of spectrum currently licensed to broadcast television stations. Among other things, the FCC is attempting to account for the value that the country puts on free, over-the-air television. As reflected in the information we provide below, we urge that our use of our two licensed television broadcast channels is exceptionally efficient and productive and brings great value to our communities. The cost to us and to our communities in the loss or curtailment of our over-the-air transmission service would be unacceptably enormous.

Comments

KCTS Television Programming Services

Striving to provide the highest quality on-air programming throughout Western and Central Washington, our stations air multiple programming services. We provide KCTS 9 HD, our original primary channel, now broadcast in high definition format; KCTS 9 V-me, Spanish-language public television programming; and KCTS 9 Create, the best of PBS lifestyle and how-to programming.

KCTS 9 HD programming includes the PBS primetime schedule, from *Nature*, *Masterpiece* and *Austin City Limits* to *FRONTLINE*, *Independent Lens*, *PBS NewsHour*, *Washington Week* and other trusted news and information programming. KCTS 9 HD and KYVE 47 HD also provide local public affairs programming, produced in and for our community, weekly, as well as tailored news, entertainment and information programming especially selected for local viewers.

KCTS 9 Create is a standard definition programming stream. It includes programs such as *Rick Steves' Europe*, *This Old House*, *Lydia's Italy* and many other public television programs that provide access to quality information and entertainment. KCTS 9 V-me is also a standard definition programming stream.

A great number of our viewers live in areas where the only way to receive our signal is over-the-air. Neither KCTS 9 V-me nor KCTS 9 Create is carried by a DBS provider. Cable systems that carry KCTS 9 V-me and KCTS 9 Create do not include them in their "locals only" plans. Most cable companies require a subscriber to have basic digital in the \$40/month price range to access KCTS 9 V-me and KCTS 9 Create. Thus, even where DBS and/or cable service is available and might be subscribed to,

viewers would not be able to obtain the full panoply of our programming services if our over-the-air signal is terminated.

Our Spanish language service is critically important to our mission. KCTS began transmission and localization of KCTS 9 V-me in 2007. V-me is more than re-packaging of familiar content. It is a touchstone for engaging the country's fastest growing demographic in important local and national issues. There is no other service in Spanish broadcast that brings V-me's mix of civic affairs, community engagement, compelling educational programming and entertainment to Spanish-speaking audiences.

Furthermore, in the past eighteen (18) months, KCTS has produced Spanish-language versions of local public affairs, history and informational programs for KCTS 9 V-me. These include **Pregúntele a la gobernadora** (*Ask the Governor*) a quarterly call-in program providing direct access to the state's highest governing official; **Tiempos Difíciles: Superación de la crisis financiera** (*Tough Times: Overcoming the Financial Crisis*), a three-part series providing resources and information for individuals and families struggling with the effects of the current financial crisis; **Aprender y crecer con su hijo** (*Ready, Set, Grow*), a primetime town-hall special on early childhood education for parents and caregivers; and **Estudiantes del Cambio: Los del '68** (*Students of Change*), examining an important but little-known chapter of Northwest history: the story of the first group of Mexican-American students to gain access to higher learning in Washington state. KCTS weaves the sizeable Spanish-speaking population into broader discussions of regional issues.

Why offer public, free educational TV to this population at this time? Latinos represent the state's future: they are the fastest-growing demographic in Washington. The Latino school age population has grown 372% in recent years. KCTS Television

understands that now is the time for language-appropriate, fully accessible programming that invites parents and children to learn together.

With the recent conversion to digital television, KCTS 9 V-me represents an unparalleled service in free broadcast, which is particularly important for a community that is over represented in lower socioeconomic strata, yet—as revealed in a recent study by the Pew Hispanic Center—demonstrates great determination and potential. KCTS's V-me service reaches across the state, where it is accessible to rural communities where Latinos are the majority and where many, especially migrant families, depend on over-the-air service. Some of our most enthusiastic comments have come from viewers who would not have access to KCTS 9 V-me other than over-the-air. As one viewer states through translation, *"since now we have approached the digital TV transition, many of us are opting for the converter box and the free over-the-air signal – and V-me is the most popular channel."*

Spectrum Utilization

Our stations KCTS-DT and KYVE-DT are using our maximum channel throughput for our HD and SD programming at all times. Thus, without curtailing our programming services we could not "share" our channel capacity with other broadcasters by transmitting their signals on our channel.

Alternative Distribution and Costs

Only three (3) cable, telco operator and satellite system providers have a direct or microwave feed of our signal. Twenty-eight (28) other providers rely on over-the-air reception for pickup and distribution of our signal. A number of those providers serve our viewers in the rural areas of Western and Central Washington where we can only provide our signal over the air. To replace over-the-air delivery to cable, telco and satellite system

headends that pick up our signal over-the-air would mean providing fiber connectivity to each provider at a rate of \$1,500 to \$3,000 per month per provider. Microwave connectivity could be \$30,000 to \$60,000 per hop depending on existing infrastructure and site leases could run \$500 to \$1,000 per month per site lease required to locate equipment. The cost would not be insignificant.

We (and our communities) have made an enormous investment in our television stations, most recently in the digital transition. Our expenditures include: KCTS 9 VHF DTV transmitter: \$230,802 (50% from CPB DDF Round 10 funding); KCTS 9 and KYVE 47 EAS for DTV Transmission: \$90,100 (\$67,575 from CPB DDF R9 funding); KYVE 47 DTV Transmitter: \$738,480 (50% from CPB DDF 2002 funding); KCTS 9 new antenna, t-line and combiner for pre-transition DTV and post-transition DTV: \$509,400 (50% NTIA 1998 funding closed on 1/10/2001); KCTS 9 DTV STL, original: \$157,552 (50% NTIA 1998 funding closed on 1/10/2001); KCTS 9 and KYVE DTV encoding: \$440,510 (50% NTIA 1998 funding closed on 1/10/2001); KCTS 9 pre-transition DTV transmitter: \$536,609 (50% NTIA 1998 funding closed on 1/10/2001); KCTS 9 and KYVE 47 DTV encoding equipment: \$177,336 (100% Digital Capital Fund), plus \$31,400 additional HD encoder and \$10,000 switcher; KCTS 9 DTV STL: \$32,000 (100% Digital Capital Fund); KCTS 9 DTV Stream Monitor: \$51,000 (100% Digital Capital Fund); Master Control: HD Video Proc: \$46,556, HD server: \$97,668, drivers: \$5,100, additional server: \$5000, HD emergency switcher: \$6,932; KYVE HD upconverter and DA: \$32,291, HD encoder additional, KCTS HD upconverter and DA: \$11,300, HD server archive interface: \$4,000; HD server add & upgrade: \$48,092.

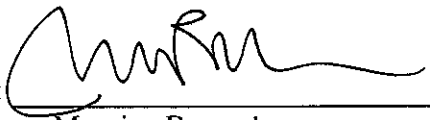
If KCTS and KYVE lost the use of the broadband spectrum, the following equipment would be rendered useless: the KCTS 9 VHF DTV transmitter, the KCTS 9

and KYVE 47 EAS for DTV transmission, the KYVE 47 DTV transmitter, the KCTS 9 new antenna, t-line and combiner for pre-transition DTV and post-transition DTV, and the KCTS 9 DTV STL. This equipment represents an investment of over \$2.2 million dollars in station and grant funds, the vast majority of which are sourced from individual and other community contributions.

Conclusion

Based on the foregoing reasons, we urge the Commission to find that our use of our television broadcast channels efficient and productive, and abundantly serves the public interest. Our over-the-air transmission capabilities must be protected in any effort that the Commission might undertake to allocate more spectrum for wireless broadband systems.

Respectfully submitted,

By: 
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